



*Consulting Engineers  
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November 10, 2005  
(PBW Project No. 1259)

VIA ELECTRONIC MAIL

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: October 2005 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Preparation of Draft RI/FS Work Plan (SOW Paragraph 17) – submitted to EPA on October 7, 2005;
  - Preparation of Draft RI/FS Sampling and Analysis Plan (SAP)(SOW Paragraph 25) – submitted to EPA on October 7, 2005;
  - Submittal of Financial Assurance Information (UAO Paragraph 83) – submitted separately by Dow and Sequa to EPA by October 26, 2005; and
  - Acquisition of access to properties immediately adjacent to the north and northeast of the Site (relative to Site property north of Marlin Avenue) (UAO Paragraph 72) – progress report on properties for which access has been obtained and request to extend time required to complete acquisition to November 29, 2005 – submitted to EPA on October 28, 2005.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No data were received or generated during the previous month.

3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
- Acquisition of access to properties immediately adjacent to the north and northeast of the Site (relative to Site property north of Marlin Avenue) (UAO Paragraph 72) – to be completed by November 29, 2005 (per October 28, 2005 extension request);
  - Submittal of Final Screening-Level Ecological Risk Assessment (SLERA)(SOW Paragraph 37d) – to be submitted by November 18, 2005 (within 15 calendar days of receipt of EPA's comments on the Draft SLERA - comments were received on November 4, 2005);
  - Submittal of Final RI/FS Work Plan (SOW Paragraph 18) – to be submitted within 20 calendar days after receipt of EPA comments on the Draft RI/FS Work Plan; and
  - Submittal of Final RI/FS SAP (SOW Paragraph 26) – to be submitted within 20 calendar days after receipt of EPA's comments on the Draft RI/FS SAP.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – The scope of activities to be performed as part of the RI/FS is described in the RI/FS Work Plan. Until that work plan has been approved by EPA, it is not possible to estimate a percentage completion for the project.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Brent Murray - Sequa Corporation  
Mr. Scott Magelssen - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morris III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP